

CARLIE CHRISTENSEN, United States Attorney (#633)  
MARK K. VINCENT, Assistant United States Attorney (#5357)  
Attorneys for the United States of America  
185 South State Street, Suite 300  
Salt Lake City, Utah 84111  
Telephone: (801) 524-5682

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

---

UNITED STATES OF AMERICA,  
Plaintiff,

v.

STEPHEN LAWRENCE DEAN,  
Defendant.

Case No. 2:15 CR 00166 DB

INITIAL NOTIFICATION OF  
COMPLIANCE AND REQUEST FOR  
RECIPROCAL DISCOVERY

JUDGE DEE BENSON

---

The United States of America, by and through the undersigned, hereby files its first notification of compliance with its discovery obligations in this case and request for reciprocal discovery from the defendant.

The United States gives notice that the following is being or has been provided to counsel for the defendant:

- 1 CD Bates #00001 – Audio Conversation dated 9/30/2014
- 1 DVD Bates #00002 – Audio Conversation dated 9/30/2014
- 1 CD Bates #00003 – Audio Conversation dated 10/15/2014

- 1 DVD Bates #00004 – Audio Conversation dated 10/15/2014
- 1 DVD Bates #00005 – Audio/Video Conversation dated 11/6-7/2014
- 1 DVD Bates #00006 – Audio/Video Conversation dated 11/6-7/2014
- 1 DVD Bates #00007 – Audio/Video Conversation dated 11/6-7/2014
- 1 DVD Bates #00008 – Audio/Video Conversation dated 11/6-7/2014
- 1 DVD Bates #00009 – Audio/Video Conversation dated 12/4/2014
- 1 DVD Bates #00010 – DISK 1 of 3, 2 of 3, and 3 of 3 - Audio/Video Conversation dated 12/04/2014
- 1 DVD Bates #00011 – Audio/Video Conversation dated 12/5/2014
- 1 DVD Bates #00012 – Audio/Video Conversation dated 12/5/2014
- 1 CD Bates #00013 – Video Footage of Field Shooting dated 2/2/15
- 1 CD Bates #00015 – Meadow Rock Quarry and Baker Hot Spring Shoots footage taken off Face Book dated 3/23/2015
- 1 CD Bates #00016 – Audio Conversation dated 3/26-27/2015
- 1 CD Bates #00017 – Audio Conversation dated 3/27/2015
- 1 CD Bates #00018 – 00365 – Discovery; Court Records, FBI Reports, Rap Sheet

As additional discoverable material becomes available, such material will be provided within a reasonable time. Throughout this case, the United States will provide material discoverable under Rules 16 and 26.2 of the Federal Rules of Criminal Procedure and the Jencks Act without requiring the defendant to make a specific request for such material. Upon the request of the defendant, the United States will permit and facilitate the defendant's own inspection, copying or photographing of those items described/defined in Rule 16(a)(1)(E).

The United States also hereby requests disclosure of evidence by the defendant (also known as reciprocal discovery) pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure and DUCrimR 16-1(c). By providing Rule 16 discovery without requiring a specific request from the defense, the United States invokes a reciprocal obligation on the defendant under DUCrimR 16-1(c), which states that the defendant must allow the government to inspect and to copy the following, as further defined in Rule 16 of the Federal Rules of Criminal Procedure:

- a. Documents and tangible objects the defendant intends to introduce as evidence at trial;
- b. Reports of examinations and tests the defendant intends to introduce at trial or that were prepared by a witness whom the defendant intends to call at trial; and
- c. A written summary of the testimony of any expert the defendant intends to use a trial under Federal Rules of Evidence 702, 703 and 705.

The United States requests that the defendant provide to the government at a reasonable time before trial, but no later than five working days before trial, copies of the material referenced in this paragraph. Further, the United States requests continuing compliance with the reciprocal discovery following the initial disclosure.

The United States also hereby requests all written and recorded statements by any witness other than the defendant whom the defendant intends to call at trial or a hearing covered by the Jencks Act or Rule 26.2 of the Federal Rules of Criminal Procedure.

DATED this 7<sup>th</sup> day of April, 2015

CARLIE CHRISTENSEN  
United States Attorney

/s/ Mark K. Vincent  
MARK K. VINCENT  
Assistant United States Attorney